

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

RETAIL ACCESS OPTIMIZATION INITIATIVE, 2011

Docket No. N2011-1

**RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO DAVID POPKIN INTERROGATORIES DBP/USPS-77 AND 78**

The United States Postal Service hereby provides institutional responses to the above-listed interrogatories of David Popkin dated September 14, 2011. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Anthony F. Alverno, Jr.  
Chief Counsel, Global Business

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2998; Fax -5402  
September 21, 2011

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-77** Please refer to your response to Interrogatory DBP/USPS-67.

- [a] Please confirm, or explain if you are unable to confirm, that the mail forwarding policies and costs will be the same whether the customer's change of address results from the discontinuance of a facility or results from an actual move by the customer.
- [b] Please confirm, or explain if you are unable to confirm, that when a post office is discontinued and a change of address is filed by a customer it will result to some categories of mail that will be forwarded postage due and the customer will have a cost if they want to receive the mail.
- [c] Please confirm, or explain if you are unable to confirm, that when a post office is discontinued and a change of address is filed by a customer it will result to some categories of mail that will not be forwarded to the customer.
- [d] Please explain why the customer who has been affected by the discontinuance of his facility by the action of the Postal Service will either have to pay postage due to receive some of his mail and/or will not receive all of the mail which was sent to his old address.

**RESPONSE**

- (a-d) Confirmed that mail forwarding costs and policies are the same, with the exception that customers filing Change of Address orders (COAs) in a discontinuance context are insulated from any forwarding charges for First-Class Mail, Express Mail, Periodicals, Package Services, and Parcel Select mail. DMM 507.2.2.3. However, customers impacted by discontinuance generally are not required to file a Change of Address. Only in situations where a customer's address cannot be duplicated at the gaining office, or where a customer chooses rural carrier delivery to replace P.O. Box service, will a customer need to file a COA. Parts (b-c) of this interrogatory simply seek confirmation of standard policies, while part (d) questions why Standard Mail is not forwarded without charge: no need to change procedures for Standard Mail (which mailers control via endorsements) was recognized.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-78** Please refer to your response to Interrogatory DBP/USPS-69. For each of the different categories of facilities that are being studied for discontinuance or consolidation, approximately what percentage of the transactions that take place would still be able to be transacted at each of the different types of alternate access facilities being considered?

I am not interested in the ratio of TYPES of transactions [as indicated by a check mark] but I am interested in the NUMBER of transactions. For example, if one is to consider the discontinuance of an independent post office and its replacement by a stamp consignment location. Assume that for a given period of time the independent post office conducted a total of one hundred customer transactions. These consisted of fifteen transactions of selling booklets of twenty Forever stamps [the only transaction type that can be accomplished at a stamp consignment location], twenty transactions of selling 29¢ post card stamps, and the remaining sixty-five transactions of accepting Media Mail parcels. In this case 15% of the transactions conducted at an independent post office can be transacted at a stamp consignment location since 15 transactions could be completed out of a total of 100 transactions.

**RESPONSE**

The clarification attached to this question confirms that the original request does not articulate a question to which the Postal Service is able to respond. Based on the response to DBP/USPS-6 and other interrogatories, it is abundantly self-evident that the overwhelming majority of postal retail transactions are stamp purchases; and that a full range of postage denominations can be purchased at postal retail locations compared to the more limited options at various alternate access channels. While it would be unconventional, parties in this docket are free to treat the entry of mail under every different retail price category in the Mail Classification Schedule and the purchase of stamps at every existing postage denomination as "distinct retail transactions" for purposes of tallying differences between the number of "distinct retail transactions" that can be conducted at a

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**RESPONSE TO DBP/USPS-78 (continued):**

Post Office vs. a Village Post Office, for example, and for calculating the ratio of Post Office to VPO "distinct retail transactions." Putting aside apparently vast differences of opinion regarding the value of such an exercise, it does not require an expenditure of postal resources to conduct. Accordingly, there should be no expectation of an expenditure of postal resources to perform that exercise.

Sufficient information in the Domestic Mail Manual, in response to DBP/USPS-6 and to other interrogatories is available for the desired percentage estimates to be calculated by those who consider that such data will materially inform the Commission in the exercise of its advisory responsibilities in this docket.